

ANDERSON KILL P.C.

Attorneys and Counselors at Law

ONE GATEWAY CENTER, SUITE 1510 ■ NEWARK, NJ 07102
TELEPHONE: 973-642-5858 ■ FAX: 973-621-6361
www.andersonkill.com

Steven J. Pudell, Esq.
SPudell@andersonkill.com
973-642-5877

March 16, 2018

Honorable Debra C. Freeman, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 705
New York, NY 10007

**Re: *Starr Surplus Lines Insurance Company and Houston Casualty Company v. CRF Frozen Foods, LLC*
Civil Action No.: 17-cv-1030 (PGG)**

Dear Judge Freeman:

Defendant CRF Frozen Foods, LLC ("CRF") and Plaintiffs Starr Surplus Lines Insurance Company ("Starr") and Houston Casualty Company ("HCC") by and through their undersigned counsel, submit this joint letter to request a short extension of two deadlines.

First, as per the Case Management Order, the parties have completed the depositions of fact witnesses by February 7, 2018 (subject to the Court's ruling on the pending motions to compel [Doc. No. 98]). The parties also have exchanged expert reports on February 21, 2018, and have recently served rebuttal expert reports on March 7, 2018. Pursuant to Judge Gardephe's Amended Civil Case Management Order, (ECF No. 101), the parties are to complete expert discovery no later than April 11, 2018. The parties have endeavored to schedule all six (6) expert witnesses before that time, but have encountered one minor scheduling issue.

Five (5) of the six (6) expert witness depositions have been scheduled to take place before April 11, 2018. Due to work, travel, and holiday conflicts, the parties were unable to schedule the remaining deposition before April 11, 2018. The parties have agreed to schedule the remaining deposition for April 17, 2018. The parties respectfully request that this Court permit the deposition of Dennis Connolly to proceed on April 17, 2018, despite the April 11, 2018 deadline.

Second, pursuant to Judge Gardephe's Amended Civil Case Management Order, (ECF No. 101), "parties seeking to make Phase I post-discovery dispositive motions should submit a letter to the Court in accordance with Rule 4(A) of the Court's Individual Practices by April 18, 2018. Opposition letters are due April 23, 2018." The parties

Anderson Kill P.C.

Judge Freeman
March 16, 2018
Page 2

respectfully request that the dates be changed to May 2, 2018 and May 7, 2018, respectively.

We thank Your Honor for your consideration in this matter.

Respectfully submitted,

/s/ Steven J. Pudell

Steven J. Pudell
ANDERSON KILL P.C.
COUNSEL FOR CRF FROZEN FOODS, LLC

/s/ John A. Nadas

John A. Nadas
CHOATE HALL & STEWART LLP
COUNSEL FOR STARR SURPLUS LINES
INSURANCE COMPANY

/s/ Jeffrey S. Weinstein

Jeffrey S. Weinstein
MOUND COTTON WOLLAN &
GREENGRASS LLP
COUNSEL FOR HOUSTON CASUALTY
COMPANY

SO ORDERED:

Honorable Debra C. Freeman, U.S.M.J.

cc: Hon. Paul G. Gardephe, U.S.D.J.